



WESTON SOLUTIONS, INC.
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EDISON, NEW JERSEY 08837
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VIA FEDEX

July 5, 2017

Ms. Susan Schulz, Toxics Section Chief
U.S. Environmental Protection Agency Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 47, which covers the activities associated with the Hatco Site from March 1, 2017 through May 31, 2017. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in blue ink, appearing to read "Jason Schindler", is written over a faint, light blue rectangular stamp or watermark.

Jason Schindler
Principal Project Manager

cc: A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, A. Martin, K. Etela (Hatco/LANXESS)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, S. Anthony (Chubb)
File No. 2.5



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 47
2. Site Location: Hatco Site
1020 King Georges Post Road
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
New Jersey Department of Environmental Protection
4. Reporting Period: March 1, 2017 through May 31, 2017
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report No. 46 on April 4, 2017.
 - 5.2 Weston provided monthly email updates to the United States Environmental Protection Agency (USEPA) on March 7, April 5 and May 9, 2017.
 - 5.3 On March 29, 2017, Weston initiated efforts to restart the automated light non-aqueous phase liquid (LNAPL) recovery system. This work involved replacing lines and pump components and testing the system to ensure proper operations. System restart activities continued through April 5, 2017.
 - 5.4 Remediation of the Northeast Impoundment (NEI) is complete. During the remediation, erosion was observed along the bank of Slingtail Creek. While this erosion was unrelated to the remediation activities, a limited area along the northeast corner of the engineered cap will require additional erosion protection to prevent future erosion from undermining the cap. Weston submitted the required permit applications to New Jersey Department of Environmental Protection (NJDEP) on March 2, 2017. On April 6, 2017, Weston received comments from the NJDEP Division of Land Use Regulation (DLUR) regarding the Flood Hazard Area permit application for streambank armoring in Slingtail Creek. On April 18, 2017, Weston discussed the comments and responses with NJDEP and submitted final responses with supplemental information to NJDEP on April 27, 2017. DLUR confirmed receipt of the responses and supplemental information on April 28, 2017, and is currently reviewing the application. Pending regulatory approval Weston plans to construct the streambank protection as part of the site-wide capping.
 - 5.5 On February 21, 2017, Weston and the Licensed Site Remediation Professional (LSRP) met with USEPA and NJDEP to review responses to NJDEP's ecological component review of the Remedial Investigation Report (RIR). On March 10, 2017, the LSRP provided NJDEP with a draft memorandum summarizing the items discussed during the Technical Consultation Meeting on February 21, 2017. NJDEP provided comments, including a request for clarification, to the LSRP later that day. Weston provided the clarification on March 13, 2017. NJDEP stated that the response was accepted and the Technical Consultation Meeting Summary was finalized by the LSRP on March 9, 2017. Copies were distributed to the stakeholders on April 3, 2017.

- 5.6 Chemtura was purchased by LANXESS in April 2017. On April 25, 2017, Weston provided the Cap Inspection Report in accordance with the "Sale of Property" clause of the Risk Based Polychlorinated Biphenyl (PCB) Disposal Approval letter dated March 30, 2005.
- 5.7 During inspection of the cap in the Southeast Leg in April 2017, Weston noted damage to the upper layer due to vehicle traffic. Weston determined that the damage resulted from excess surface water accumulation. The damage is in the upper portion of the cap and does not extend to the underlying reused soil. Weston is currently designing an improved drainage system to resolve this condition and will repair this portion of the Southeast Leg cap during the Former Lagoon Area capping project scheduled for this year.

6. Specific Requirements Previously Initiated Which are Continuing:

- 6.1 During the system restart (as noted above) Weston recovered 65 gallons of LNAPL. Automated operations continued in three of the five recovery wells. Two of the five recovery sumps with dedicated pumps (T-1C and T-1E) did not accumulate sufficient LNAPL to operate the skimmer pumps. These results suggest that the source of LNAPL to this area has been removed; Weston will continue to monitor these locations and determine whether the dedicated pumps should be replaced with sorbent at these locations. On May 3, 2017, Weston recovered an additional 58 gallons of LNAPL. LNAPL at the site is contained by the cut-off wall and recovery trenches; the mobile LNAPL downgradient of the containment was fully removed during the Southeast Leg remedial action. Total recovery through the end of this reporting period:
 - 8,866 gallons recovered using skimmers and bailers since March 2011;
 - 3,200 gallons recovered and shipped offsite in liquid phase during the Southeast Leg remediation; and
 - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the Southeast Leg remediation.
- 6.2 Weston continued development of Remedial Action Work Plan (RAWP) Addendum 4 for Woodbridge Pond. By letter dated March 1, 2017, Weston presented the conceptual remediation work plan for Woodbridge Pond to USEPA. Weston discussed the approach with USEPA and by email messages on Thursday, March 30 and Thursday April 6, 2017, Weston confirmed that the conceptual remediation approach was revised in response to USEPA's comments on the initial work plan. Weston is currently preparing the draft Remedial Action Work Plan Addendum No. 4 for stakeholder and regulatory review and approval.
- 6.3 Preparation of draft remediation report documentation for LSRP review and approval and monthly progress meetings with the LSRP.
- 6.4 Evaluation of conceptual remediation approaches for Channel D, incorporating responses to NJDEP comments on sediment delineation. On May 23, 2017, Weston provided the proposed Crows Mill Creek Field Sampling Plan to NJDEP for review. The plan is intended to complete the delineation of bis(2-ethylhexyl)phthalate at sample location CDG_382. Due to an oversight, copies were not sent to USEPA. An electronic copy was forwarded to USEPA on June 5, 2017.
- 6.5 The Southeast Leg Remediation was completed. Construction of the cut-off wall was completed during the Southeast Leg remediation work; no mobile LNAPL



remains downgradient of the cut-off wall. The LSRP is currently reviewing the draft Remedial Action Progress Report to document the work completed and compliance with current NJDEP remedial action reporting requirements.

- 6.6 Weston continues to conduct monthly inspections to verify that the temporary soil stabilization at the Former Lagoon Area is functioning properly.
- 6.7 Weston is currently preparing an engineering plan for the onsite capping of remaining contaminated soil and permanent capping of the Former Lagoon Area. On May 22, 2017, Weston provided electronic copies of the cap design drawings for review and approval by USEPA, the LSRP and the property owner. The project will also include repairs to a portion of the Southeast Leg engineered cap and excavation of minor surficial PCB-contaminated soil at the perimeter of Scrape Area X119 for consolidation in the Former Lagoon Area prior to capping. As requested, a hard copy of the design drawings was sent to USEPA on May 23, 2017. Weston will document the existing conditions and provide a detailed plan to complete the site-wide onsite cap construction for regulatory review and approval.

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

- 7.1 Preparation of RAWP Addendum 4

8. Explanation for Each Item of Non-Completion in Item 7:

- 8.1 As noted above, preparation of RAWP Addendum 4 resumed following USEPA's acceptance of Weston's remediation approach for Woodbridge Pond. The draft RAWP Addendum 4 is scheduled to be circulated for review during the next quarterly reporting period.

9. Specific Requirements to be Initiated in Next Reporting Period (June 2017 - August 2017):

- 9.1 Provide Draft RAWP Addendum 4 for regulatory review and approval.
- 9.2 Update scope and schedule for Woodbridge Pond and Channel D remediation.
- 9.3 Complete Southeast Leg Remedial Action Progress Report following LSRP review.
- 9.4 Continue preparation of NEI Remedial Action Progress Report.
- 9.5 Prepare engineering plan for site-wide capping of remaining contaminated soil and permanent capping of the Former Lagoon Area.
- 9.6 Finalize Crows Mill Creek sampling plan following NJDEP review of the draft submittal.
- 9.7 Permitting and contractor procurement for capping of the Former Lagoon Area.